

UNITED STATES DISTRICT COURT

for the

Southern District of Ohio

United States of America

v.

Randy M. Poling
531 Harrison Street
New Lexington, OH 43764

Case No.

2:19-mj-251

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of 11/18/18 to 2/26/19 in the county of Franklin in the
Southern District of Ohio, the defendant(s) violated:*Code Section*18 U.S.C. 2252(a)(2) and 2252A(a)
(2)*Offense Description*Distribution and receipt of visual depictions of minors engaged in sexually
explicit conduct and/or child pornography, via any means or facility of
interstate commerce.

This criminal complaint is based on these facts:

See attached affidavit incorporated herein by reference.

☒ Continued on the attached sheet.*Complainant's signature*

David A Knight, Special Agent FBI

Printed name and title

Sworn to before me and signed in my presence.

Date:

April 1, 2019

City and state:

Columbus, Ohio

*Judge's signature*

Elizabeth A. Deavers, U.S. Magistrate Judge

Printed name and title

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION**

In the Matter of the Criminal Complaint:

United States of America

v.

**Randy M. Poling
531 Harrison Street
New Lexington, OH 43764**

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, David A. Knight, a Special Agent with the Federal Bureau of Investigation, Columbus Resident Agency, being first duly sworn, hereby depose and state as follows:

1. I, SA David A. Knight (your affiant), make this affidavit in support of a criminal complaint to arrest for violations of Title 18 United States Code §§ 2252(a)(2) and 2252A(a)(2), Distribution and Receipt of Child Pornography. Since this affidavit is being submitted for the limited purpose of securing a criminal complaint and arrest warrant, your affiant did not include each and every fact known concerning this investigation. Your affiant did not withhold any information or evidence that would negate probable cause. Your affiant set forth only the facts that are believed to be necessary to establish probable cause that Randy M. POLING committed the violations listed above.

2. Your affiant has been employed as special agent for the Federal Bureau of Investigation (FBI) since August of 2007. Prior to employment with the FBI, your affiant worked as a Columbus Police Officer where he worked on the Child Exploitation Task Force conducting online child enticement and child pornography investigations. Currently with the FBI, your affiant is the coordinator for the FBI Columbus Child Exploitation Task Force and has been in that position since 2013. Your affiant has gained experience through a Juris Doctorate degree, and has received specialized training in the area of internet crimes involving child exploitation and child pornography investigations. Your affiant has been involved in hundreds of investigations involving internet crimes against children, resulting in dozens of felony arrests and convictions. As a special agent with the FBI, your affiant is authorized to investigate violations of the laws of the United States under the authority of the United States.

3. On November 18, 2018, an undercover law enforcement officer (hereinafter UCO) with the New York State Police became engaged in an investigation on the "Meet24" dating application. Meet24 is a dating application that can be accessed via any computer or smartphone with an

internet connection. Meet24 is known to law enforcement as a forum utilized by individuals who have a sexual interest in children, to discuss this sexual interest with like-minded individuals and/or to trade child pornography. The UCO created a profile that included a profile picture of a young girl and a profile title of "Trade or meet". On that same day, a user by the name of "Randy" sent a message to the UCO on the Meet24 application. Randy's profile picture showed a white adult male with brown hair wearing a blue t-shirt. The profile information listed Randy's age as 19 years old and living in New Lexington, Ohio. Randy's profile title stated "im so fucking horny".

4. Randy sent an unsolicited message to the UCO's profile stating "what we trading". The UCO responded by saying "young fun". Randy replied with "ok u show me" and then immediately sent an image to the UCO of a young girl, approximately 13 years old, nude from the waist down, exposing her vagina and showing her breasts. After sending the image, Randy followed up with "I have a lot of young girl nudes".

5. Randy then stated to the UCO "Ur turn send pic". The UCO replied "That's some older stuff bro...I was talking young. Its cool if your not into it" Randy replied "show me how young". The UCO stated, "lol nice try cop".

6. At this point, Randy sent an image depicting two young girls, between the ages of 3 and 6, laying on a bed nude and exposing their vaginas. Randy then immediately sent a second image of a young girl approximately 4 years old, laying on her back, wearing only a shirt, exposing her vagina and anus. The UCO replied to Randy by stating "a little better" and Randy immediately responded with "I'm not a cop" and "show me your pics now i have more". The UCO inquired "What ages you into" and Randy stated "don't matter any pics u wanna send". The UCO offered "I got a 9 yo niece if your into that" and Randy responded "like I said show pics". The UCO then sent several pictures that depicted a clothed young-looking female, but did not show the face of the individual. The clothed young-looking female is an adult police officer posing as a young girl.

7. Later in the conversation Randy sent an image depicting two prepubescent female children, approximately five years old, standing naked next to each other. One of the female children is bent over and one child is using her hands to spread the other child's butt and vagina. The UCO commented on the image "Nice that's pretty hot" and "Bro Ive already sent to many. If you wanna talk meet we can. You seem like your into the right stuff". Randy responded by saying "I wanna see at least one of her ass showing good in a pic". The UCO replied "Nah sorry bro. To risky for me. If you dont wanna talk I get it".

8. On November 26, 2018, a subpoena was sent to Meet24 in regards to account information regarding use name "Randy" from New Lexington, Ohio with the profile title "im so fucking

horny". On November 28, 2018 Meet24 responded stating that the account in question is registered to user "Randy" and was registered using his Facebook account (Facebook ID: 1019324487357172, Facebook Name: Randy POLING). An examination of the Facebook page of Facebook ID 1019324487357172 revealed it belongs to a Randy POLING with pictures from the Facebook page matching the profile picture from the Randy Meet24 account.

9. Meet24 also provided login IP addresses for the above referenced Meet24 account. On November 18, 2018, the above referenced Meet24 account logged into the network six different times. The only IP address that was used for these logins was 108.201.15.64. This target IP address is resolved to AT&T U-verse.

10. On January 28, 2019, your affiant sent an administrative subpoena to AT&T U-Verse requesting subscriber information for IP address 108.201.15.64 for the date of November 18, 2018. On February 3, 2019, AT&T responded with the subscriber information for IP address 108.201.15.64 on November 18, 2018. The subscriber name for the IP address is Christina Bowers and the address is 531 Harrison Street, New Lexington, Ohio 43764.

11. In January of 2019, an undercover FBI TFO began chatting with Randy on Meet24. The UC was posing as the adult mother of two minor children. During the course of the Meet24 chats and in subsequent text message conversations, Randy and the UC discussed engaging in various sexual acts with each other and with the UC's fictitious minor children.

12. On February 7, 2019, your affiant researched the address 531 Harrison Street, New Lexington, Ohio 43764 through the Ohio Law Enforcement Gateway (OHLEG). The research revealed that Randy POLING lists 531 Harrison Street, New Lexington, Ohio 43764 as his home address on his driver's license. Furthermore, a search of the law enforcement Lexis Nexis database revealed that both Christina Bowers and POLING have 531 Harrison Street, New Lexington, Ohio 43764 listed as their home address.

13. On February 14, 2019, your affiant obtained a federal search warrant issued in the U.S. District Court for the Southern District of Ohio for the residence located at 531 Harrison Street, New Lexington, Ohio 43764. On February 27, 2019 your affiant executed the search warrant at 531 Harrison Street. POLING was located in a bedroom of the residence, laying in bed, with his cell phone next to him, at the time the search warrant was executed.

14. During the execution of the search warrant, your affiant interviewed POLING in front of his residence. POLING acknowledged having a Meet24 account and confirmed that the profile observed by your affiant during this investigation was a picture of him. POLING recalled the Meet24 conversations with the UCO and acknowledged that a sexual interest in children was discussed. Later in the interview, POLING confirmed that the cell phone found in his bed was

his and that he believed that there would be screen shots of child pornography on the phone, but claimed he did not know how it got there, because his cell phone just randomly created screen shots. According to POLING, he hadn't used the cell phone in several days because he was nervous about the screen shots that the phone was creating. However, he admitted that he had attempted to login to his Meet24 account on the phone approximately a day prior, to see if he could access the account. POLING claimed that he had not been able to access the Meet24 account for several years.

15. On February 27, 2019, a forensic examination was performed on POLING's cell phone, an LG smart phone. The examination revealed over more than 450 images of child pornography, to include six of the images described above that were sent to the UCO via the Meet24 application during his conversation with Randy on November 18, 2018. Several of the child pornography images, including one that depicted a nude minor female, approximately six to eight years of age, laying on her back on a bed with her legs spread and bound to her arms and duct tape over her mouth, had file created dates of February 26, 2019. Other child pornography images had file created dates as early as September of 2018, and depicted children ranging in age from approximately two to 15 years engaged in the lascivious display of the genitalia and sex acts, including oral sexual intercourse. Most of the child pornography images had titles and file paths indicating they were screenshots. A screenshot is a function available on smartphones that allows the user to capture a digital image of the current display of the smartphone and save it as an image file. Screenshots can only depict content that is visible on the screen of the phone at the time that the screenshot is taken.

16. The web history on POLING's phone indicated that on February 24, 2019, POLING had visited several galleries on the website youngheaven.com. Your affiant knows this website to be an adult pornography website that provides the user with images and videos for individuals who have a fetish for women who are petit and have the appearance of being extremely young. The website title page for youngheaven.com states "The source of the hottest young porn and nude teen pictures". Additionally, numerous Facebook Messenger conversations were recovered from POLING's cell phone, as well as clothed photographs of what appear to possibly be minor females that have file paths indicating they were obtained from Facebook. Given the nature and file paths of the photos and the user names and content related to the Facebook Messenger chats, it appears that POLING was utilizing Facebook to attempt to make contact with minor females.

17. During the course of the investigation, your affiant spoke with Detective Sarah Emmons with the New Lexington Police Department. Detective Emmons is familiar with POLING and stated that he is currently the subject of a rape investigation by the New Lexington Police Department. Detective Emmons provided police reports to your affiant which revealed that in March 2014, when POLING was almost 15 years old, he allegedly digitally penetrated an 8-year-old female victim. Detective Emmons stated that administrative issues had delayed the case from

being prosecuted, but rape charges were finally brought against POLING in 2018. Detective Emmons confirmed that according to her records, POLING's current address is 531 Harrison Street, New Lexington, Ohio 43764.

18. Furthermore, your affiant obtained a criminal history report for POLING and discovered that in April 2011, when POLING was approximately 11 years old, he was charged with assault and gross sexual imposition by the Lancaster (Ohio) Police Department. After receiving court records from the Fairfield County Court of Common Pleas, Juvenile Division, your affiant discovered that POLING pled guilty to assault under the condition that the sexual imposition charge would be dropped. Court documents reviewed by your affiant describe the victim of the sexual imposition as being of a similar age as POLING at the time of the incident.

19. Based upon the above information, your affiant believes there is probable cause to believe Randy M. POLING has committed the offenses of the Distribution and Receipt of Child Pornography in violation of 18 U.S.C. §§ 2252(a)(2) and 2252A(a)(2). Therefore, your affiant respectfully requests this court issue a criminal complaint and arrest warrant.



David A. Knight
Special Agent
Federal Bureau of Investigation

Sworn to and subscribed before me this 1st day of April 2019.



Elizabeth A. Deavers
United States Magistrate Judge
United States District Court
Southern District of Ohio